[redacted]

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May 24, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, N.W.
12th Street Lobby B TW-A325
Washington, D.C. 20554

Re: WT Docket 01-90

Dear Ms. Salas:

On May 16, 2001, Motorola submitted the attached letter responding to the Wireless Telecommunications Bureau's request for public comments on licensing and service issues surrounding the deployment of Digital Short Range Communications services. Motorola's submission was filed in accordance with the directions contained in the FCC's original Public Notice that was released on March 22, 2001, and was captioned simply by referring to the DA number of that public notice (DA 01-696).

Motorola subsequently learned that the Wireless Telecommunications Bureau established a docket file for these "pre-rulemaking" submissions. Therefore, Motorola asks that you associate its previously filed comments, which were timely filed as evidenced by your "received" stamp, in WT Docket No. 01-90. This will serve the public interest by ensuring a more complete record especially in this very early phase of these proceedings.

Please contact me if there are any further questions on this matter.

Sincerely,

Michael A. Lewis

Michael A. Lewis
Engineering Consultant

cc: Nancy Zazcek, WTB

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MOTOROLA

Stamp and Return

May 16, 2001

RECEIVED

MAY 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
TW-A325
Washington, D.C. 20554

In Re: Public Notice DA 01-686 – Wireless Telecommunications Bureau Seeks Comment Regarding Intelligent Transportation System Applications Using Dedicated Short Range Communications

Dear Ms. Salas:

Motorola welcomes the opportunity to submit these comments in response to the above-captioned public notice in which the Wireless Telecommunications Bureau ("WTB" or "Bureau") seeks information regarding current, emerging and potential Intelligent Transportation System ("ITS") applications that use Dedicated Short Range Communications ("DRSC"). Specifically, the Bureau is seeking comment on a status report submitted in October 2000, by ITS America that details the legal, technical, and economic issues of developing and deploying DRSC-based ITS services in the 5.850-5.925 GHz ("5.8 GHz") band. The Bureau states that it seeks this information to assist it in developing the licensing and service rules that will apply to DSRC-based ITS applications.

Motorola applauds the Bureau's initiative. DSRC is the next step forward in the evolution of in-vehicle telecommunications services with significant potential to enhance driver safety and awareness, an area of deep Motorola commitment. Motorola supports several educational initiatives to promote responsible driving, including CTIA's product certification program, which requires that the industry safety tips be packaged with every phone, and CTIA's comprehensive, nationwide awareness campaign, which is reaching millions of consumers across the country. In addition, Motorola is developing its own internal employee educational material on safe driving awareness and is engaged in ongoing research and developed directed at products for assisting drivers in performing driving tasks safely and efficiently. Motorola believes that DSRC-based ITS services can play a significant role in this continuing effort.

In its purest form, DSRC-based ITS services could use both narrow and wide band channels to improve transportation through such applications as simple toll and traffic information broadcast schemes and advanced traffic management and roadside vehicle monitoring arrangements. However, as noted in the ITS America Report, it is not clear at this time that such publicly funded transportation initiatives will be able to drive the market for consumer based products designed for the automobile. Without government intervention in terms of mandating the installation of such devices in automobiles, it may be necessary to allow some form of commercial applications to help fuel the initial deployment of consumer devices. Such for-profit applications would likely focus on e-commerce operations or location based advertising such as

MOTOROLA

May 16, 2001

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Secretary
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fast food drive-through payments and consumer promotional offers. Involvement of the automobile manufacturers in offering DSRC applications through their existing Telematics operations could assist in developing the critical mass needed for wholesale adoption of DSRC-based technology.

Motorola believes that it is still premature to decide such issues at this time. Motorola believes that additional standards work is necessary before the ITS community can decide whether to recommend that DSRC-based ITS services be augmented with for-profit commercial applications. This standards work should occur throughout the remainder of 2001.

Finally, Motorola notes that, by definition, DSRC services are limited to transferring data over short distances that are related to the improvement of traffic flow, traffic safety and other intelligent transportation services. Such services are not intended to support mission critical public safety responders in Law Enforcement, Fire Protection and Emergency Medical services. These users require additional spectrum for broadband integrated multimedia video, data and voice applications apart from ITS.

Sincerely,

Robert D. Kubik /mlc

Robert D. Kubik
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